EXHIBIT 3

In the Matter of:

CFPB v. Navient Corporation, et al.

June 8, 2018 Patricia Peterson

Condensed Transcript with Word Index



For The Record, Inc. (301) 870-8025 - www.ftrinc.net - (800) 921-5555

	1			3
1	IN THE UNITED STATES DISTRICT COURT	1	MIKE KILGARRIFF, ESÇ) .
2	FOR THE MIDDLE DISTRICT OF PENNSYLVANIA	2	Kirkland & Ellis LLP	
3		3	665 Fifteenth Street	, NW
4	CONSUMER FINANCIAL PROTECTION)	4	Washington, DC 20005	,
5	BUREAU,)	5	(202) 879-5149	
6	Plaintiff,) Case No.	6	mike.kilgarriff@kirk	land.com
7	vs.) 3:17-CV-00101-RDM	7	and	
8	NAVIENT CORPORATION, et al.,)	8	MATTHEW SHELDON, ESQ).
9	Defendants.)	9	Navient Solutions LLC	
10)	10	2001 Edmund Halley D	
11		11	Reston, Virginia 201	.91
12	Friday, June 8, 2018	12	(703) 984-6732	
13		13	matthew.sheldon@navi	ent.com
14	Consumer Financial Protection Bureau	14		
15	1990 K Street, NW	15	ALSO PRESENT:	
16	Washington, DC	16	April Carter, Video	specialist
17		17		
18		18		
19	The above-entitled matter came on for	19		
20	investigational hearing, pursuant to notice, at	20 21		
21	9:40 a.m.			
22		22 23		
23		23		
24 25		25		
1	APPEARANCES:	,	INDEX	4
2	APPEARANCES.	$\begin{bmatrix} 1 \\ 2 \end{bmatrix}$	DEPOSITION OF PATRICIA PETERSON	
3	ON BEHALF OF THE CONSUMER FINANCIAL PROTECTION BUREAU:	3	JUNE 19, 2018	
4	NICHOLAS JABBOUR, ESQ.	4	00NE 17, 2010	,
5	ANDREA MATTHEWS, ESQ.	5	EXAMINATION	PAGE
6	Consumer Financial Protection Bureau	6	By Mr. Jabbour	6
7	1990 K Street, NW	7	-	
8	Washington, DC 20006	8	EXHIBITS MARKED	PAGE
9	(202) 435-7591	9	Number 1	7
10	nicholas.jabbour@cfpb.gov	10	Number 2	7
11	andrea.matthews@cfpb.gov	11	Number 3	22
12		12	Number 4	27
13	ON BEHALF OF NAVIENT AND THE WITNESS:	13	Number 5	75
14	JONATHAN E. PAIKIN, ESQ.	14	Number 6	85
15	KARIN DRYHURST, ESQ.	15	Number 7	96
16	DANIEL KEARNEY, ESQ.	16	Number 8	104
17	Wilmer Cutler Pickering Hale & Dorr LLP	17	Number 9	118
18	1875 Pennsylvania Avenue, NW	18	Number 10	124
19	Washington, DC 20006	19	Number 11	149
20	(202) 663–6703	20	Number 12	152
21	jonathan.paikin@wilmerhale.com	21	Number 13	153
22	karin.dryhurst@wilmerhale.com	22	Number 14	180
23	daniel.kearney@wilmerhale.com	23		
24	and	24		
25		25		

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call a free form message, and in that -- those cases,

they don't have a consistent format to them, and it's

what the customer has said.

much more difficult to pull the information out of our

system. But on an account-by-account basis, we can see

Q. I didn't understand fully. What was the canned

message that's used when a -- that you were referring to

59 57 questioning how to resolve a dispute, customer looking 1 1 with respect to correspondence? 2 2 for basic information. A. An example of that is normal course of our 3 O. Does the -- Navient Solutions doesn't have a way 3 process may be a better example, is a letter. When we 4 to search those non-escalated inquiries. Is that right? 4 send a letter to the customer, and it's coming out of 5 5 A. I don't know that I would say it doesn't, it -our system, it looks the same every single time in our it in the normal course of business, our agents would 6 correspondence system. So if I send a K008, which is 6 7 7 document the system on what happened during the the repayment options letter, I can tell you every 8 conversation, or generally what a written correspondence 8 single time that letter was sent through a query. 9 would say, and we have call recordings as another 9 Q. And so you can query the correspondence screen 10 mechanism to, you know, document or know what's happened 10 for, say, K008, for example? 11 during those conversations. 11 A. Yes. 12 Q. When there's documentation put into -- I'm 12 Q. And you can do that across all borrowers? 13 sorry, the documentation you referred to concerning 13 A. Yes. 14 14 Q. But because a customer's conversation doesn't -written correspondence or a conversation with a 15 15 borrower, where -- where does that documentation go when I'm sorry, let me rephrase that. 16 it's done by a customer service representative? 16 When correspondence comes in from a borrower 17 A. Directly into CLASS. 17 that's not a form, that's just a narrative letter from 18 18 Q. Is the -- and is there a particular field within the borrower, is there a way to query what borrowers say 19 19 CLASS? in those letters, or is that similar to what you said 20 A. The correspondence entry screen -- the 20 with the conversations, where there's no consistent 21 21 correspondence screen in the system. format? 22 Q. And that correspondence screen is where notes 22 A. We can see a letter came from the customer in a 23 23 about correspondence or conversations with the borrower consistent way, so I can see that a -- we received a 24 are supposed to go? 24 written inquiry. That looks the same. The actual 25 A. Correct. 25 content of that letter is not something that's 60 58 1 Q. Is there any way to search those correspondence 1 documented within our correspondence system. A summary 2 screens across all of CLASS? 2 of that letter, because the -- once the customer service 3 A. It depends on what type of thing you're looking 3 agent worked it, would be put in what I had called the 4 4 free form notes. 5 5 Q. And what would it -- can you clarify, what would Q. On the correspondence screen, are the free form 6 6 it depend on? notes in a different part of that field than the place 7 7 A. We have within the system ways that you can do where like the K008 letter might be notated? 8 8 consistent messages, so we would call those canned A. It visually would be easier to show you, if you 9 9 messages. Those are easy to query. So a canned message had a document, but there's -- there is -- where it says 10 might be I received a document -- a document was imaged. 10 K008 is one field, and then there is -- that's kind of 11 It has a very consistent message that appears every 11 the high-level description, and then to the right of 12 single time that piece of correspondence comes in. 12 that is the more written out description that says that 13 13 Conversations with our customer service reps, what type of letter it is. 14 that might be we verified their address and telephone, 14 In the case of a free form core message, there 15 is another example of something that is a documented 15 is different words than K008, it will say something like 16 canned message. The actual message itself that 16 GD00, TK00, something like that, and then to the right, 17 it will have the entire message that whatever the 17 describes what the customer has said during that 18 correspondence, or that conversation, is what we would 18 customer service agent typed in.

Q. And so GD00, and TK00, those are codes that

basically open it up so that somebody can put in more of

A. Yeah, just general. They are the codes that

a message. If you typed K008, you don't have the

ability to free form and type anything more, it's going

to prefill with the rest of the information, but if you

signify something. Is that right?

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1	DISTRICT OF COLUMBIA, to wit:
2	T Gally To Ourde CEDE the officer before whom
3	I, Sally Jo Quade, CERT, the officer before whom the foregoing deposition was taken, do hereby certify
4	that the within-named witness personally appeared before me at the time and place herein set out, and after
5	having been duly sworn by me, according to law, was examined by counsel.
6 7	I further certify that the examination was recorded stenographically by me and this transcript is a true record of the proceedings.
8	I further certify that I am not of counsel to
9	any of the parties, nor an employee of counsel, nor related to any of the parties, nor in any way interested in the outcome of this action.
10	As witness my hand and notarial seal this 22th
11	day of June, 2018.
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13	
14	Lally Cheade
15	Sally Jo Quade, CERT Notary Public
16	Notary rabile
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